

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

CYNTHIA K. HAYNES (a/k/a Cynthia K.)	
Randolph), individually and under the Missouri)	
Wrongful Death Statute)	
)	
Plaintiff,)	
)	
vs.)	Case No: 1:21-CV-00160-SNL
)	
JENNIFER WILLIAMS, individually, et al.)	
)	
Defendants.)	

**THE WILLIAMS DEFENDANTS' MOTION FOR ADDITIONAL TIME
TO RESPOND TO THE AMENDED COMPLAINT**

Come now Defendants, Jennifer Williams, individually, and Jennifer Williams, d/b/a Williams Law (collectively hereinafter "Williams"), by and through undersigned counsel, and for their Motion for Additional Time to File Responsive Pleadings, Motions, and/or an Answers to Plaintiff's Amended Complaint, up through and including January 10, 2022, and state as follows:

1. On November 12, 2021 ("Plaintiff") filed her Amended Complaint in this case.
2. On November 19, 2021, the Williams Defendants were served with a copy of the summons and the Amended Complaint.
3. Pursuant to Federal Rule of Civil Procedure Rule 12, the Williams Defendants' responsive pleadings, motions, and/or an answers to Plaintiff's Amended Complaint are due to be filed in this Court on December 10, 2021.
4. The undersigned counsel was recently retained to provide a defense for the

Williams Defendants in this action.

5. The Amended Complaint arises out from events that occurred in a domestic relations matter which began in 2013 and is not yet resolved. The Amended Complaint is seventy (70) pages long and includes two hundred-sixty-seven (267) paragraphs alleging wrongful death arising from the Williams' Defendants appointment as guardian ad litem for the decedent.

6. Accordingly, the Williams Defendants respectfully request an extension of time, up through and including **January 10, 2021**, to file their responsive pleadings, motions, and/or an answers to the Amended Complaint.

7. The additional time is necessary so that the Williams Defendants' counsel may adequately prepare a response to the Amended Complaint, investigate the allegations, become apprised of the background facts related to this case, and research the issues of law before the Court.

8. Additionally, the due to the demands associated with counsels' other professional obligations and scheduling limitations related to the holiday season, the Williams Defendants request an extension.

9. On December 6, 2021, the Williams Defendants' counsel contacted Plaintiff's counsel via email to request consent for the additional time, up through and including January 10, 2022.

10. On December 7, 2021, Plaintiff's counsel responded to the Williams Defendants' request and advised that consent for additional time would not be issued without certain conditions being met.

11. Defendants believe such conditions are premature and therefore seek the requested relief and additional time directly from the Court.

12. Granting Defendant's request for additional time is not done to prejudice any of the parties to this cause of action or to cause undue delay in these proceedings as no other parties have filed their responsive pleadings and/or answers to date.

WHEREFORE, Defendants, Jennifer Williams, individually, and Jennifer Williams, d/b/a Williams Law respectfully request that this Court enter an Order extending the deadline for them to file responsive pleadings, motions, and/or an Answer to the Amended Complaint, up through and including January 10, 2022, and for such other relief as the Court deems necessary under the circumstances.

Respectfully submitted,

ROBERTS PERRYMAN, P.C.

By: /s/ Susan M. Dimond
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Attorneys for Defendants Jennifer Williams and
Jennifer Williams d/b/a Williams Law

CERTIFICATE OF SERVICE

I hereby certify that on December 7, 2021, the foregoing was electronically filed with the Clerk of the Court using CM/ECF electronic filing system which will send notification of such filing to the following and email to all counsel of record:

Laurence D. Mass [laurencedmass@att.net]

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Attorneys for Plaintiff

/s/ Susan M. Dimond